

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 207**

**CERTIFICATION OF COUNSEL REGARDING ORDER (A) AUTHORIZING THE  
DEBTORS TO RETAIN A&G REALTY PARTNERS, LLC AS A REAL ESTATE  
CONSULTANT AND ADVISOR EFFECTIVE AS OF THE PETITION DATE AND  
(B) WAIVING CERTAIN REPORTING REQUIREMENTS**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certifies as follows:

1. On the September 18, 2024, the Debtors filed the *Debtors’ Application for Entry of an Order (A) Authorizing the Debtors to Retain A&G Realty Partners, LLC as a Real Estate Consultant and Advisor Effective as of the Petition Date and (B) Waiving Certain Reporting Requirements* (D.I. 207) (the “**Application**”).<sup>2</sup> A proposed form of order granting relief was attached to the Application (the “**Proposed Order**”).

2. The Debtors have revised the Proposed Order to incorporate comments from the Office of the United States Trustee (the “**U.S. Trustee**”). The revised form of order

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

<sup>2</sup> Capitalized terms not defined herein have the meaning ascribed to them in the Application.

granting the relief requested in the Application (the “**Revised Proposed Order**”) is attached hereto as **Exhibit A**.

3. A redline comparing the Revised Proposed Order against the Proposed Order is attached hereto as **Exhibit B**.

4. The U.S. Trustee has confirmed that it has no objection to entry of the Revised Proposed Order.

WHEREFORE, the Debtors respectfully request entry of the Revised Proposed Order attached hereto as **Exhibit A**.

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Dated: October 18, 2024  
Wilmington, Delaware

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